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May 22, 2014

**Via ECF**

Honorable John G. Koeltl  
United States District Court  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: Schutte Bagclosures Inc. et al. v. Kwik Lok Corp., No. 12-cv-5541 (JGK)**

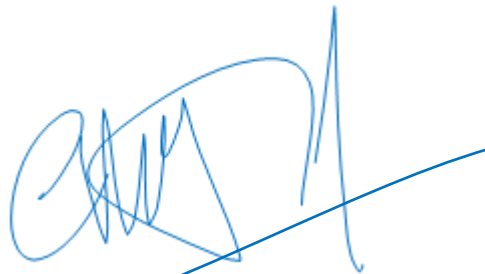
Dear Judge Koeltl:

We write regarding the Motions for Summary Judgment due to this Court on May 23, 2014, as per your Honor's Order dated April 28, 2014 (DE 79). Schutte Bagclosures Inc. ("Schutte Inc.") seeks permission, as per Section 2(C) of Your Honor's Individual Practices, for an extension of the page limit for its Motion for Summary Judgment ("Motion"). As per the New York Standing Order Regarding Case Management Techniques For Complex Civil Cases issued in this case, ("Standing Order") (DE 2), "[a]ny party may request additional pages by seeking leave of the Court after having sought the consent of the adverse party or parties." Schutte Inc. has respectfully sought consent from opposing counsel, who has denied such request.

Schutte Inc. hopes to effectively dispose of this entire matter, which includes all of Schutte Inc.'s declaratory judgment claims and cancellation claims, and Kwik Lok Corporation's ("Kwik Lok") five counterclaims (with multiple subparts), with its Motion. Since this is a trade dress case, to establish a clear overview of the case and the issues at hand, we have found it necessary to incorporate various design drawings and charts in the brief itself to provide the court with the best understanding of the matters in dispute. Furthermore, as per your Honor's instructions during the parties' conference with the Court on April 28, 2014, incorporated within the brief is a comprehensive description of the undisputed facts, which in itself exceeds ten pages.

As a result, to properly address all of the above claims, each with multiple parts, and incorporate all relevant facts, drawings, and issues, Schutte Inc. respectfully requests the page limit for its Motion be extended from 25 pages to 40 pages.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Carl M.R. van der Zandt', is written over a horizontal line. A long, sweeping blue line extends from the end of the signature across the line and under the name below.

Carl M.R. van der Zandt

**HAND BALDACHIN & AMBURGEY LLP**

cc: Brian McQuillen, Esq. (via e-mail), counsel for Defendant Kwik Lok Corporation